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BY ECF

The Honorable Gabriel W. Gorenstein
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

In Re: *New York City Policing During Summer 2020 Demonstrations*,
No. 20 Civ. 8924 (CM) (GWG)
This filing is related to all cases

Your Honor:

I am a Senior Counsel in the Office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and I am among counsel for the defense in the above-referenced matter. Defendants write, with Plaintiffs' consent, to request that the Court permit the parties to schedule two depositions beyond the current June 16, 2023, deadline for depositions.

Due to scheduling concerns of the individuals involved in the depositions of Deputy Commissioner Carrie Talansky and Deputy Commissioner Amy Litwin this week, the parties agreed to reschedule them. The parties agreed to Deputy Commissioner Litwin's deposition to take place on June 21, 2023. Deputy Commissioner Talansky's Rule 30(b)(6) deposition date is already scheduled for June 27, 2023. Plaintiffs will take her Rule 30(b)(1) deposition on that date as well. The parties further agreed that a second deposition may be held on either June 28, June 29, or June 30 of no more than four hours, if plaintiffs reasonably believe that they need additional time to complete Deputy Commissioner Talansky's deposition. A Stipulation and Proposed Order is attached hereto for the Court's endorsement regarding Deputy Talansky's deposition. This is the parties' first request to reschedule these depositions.

Accordingly, it is respectfully requested that the Court permit the parties to schedule the deposition of Deputy Commissioner Amy Litwin for June 21, 2023, and a potential second deposition date for Deputy Commissioner Carrie Talansky of no more than four hours on June 28, 29 or June 30, if plaintiffs reasonably believe they need additional time to complete Deputy Talansky's deposition.

Thank you for your time and attention to this matter.

Respectfully submitted,

Amy Robinson

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cc: ALL COUNSEL (via ECF)